

KELLER BENVENUTTI KIM LLP  
Tobias S. Keller (#151445)  
(tkeller@kbkllp.com)  
Peter J. Benvenutti (#60566)  
(pbenvenutti@kbkllp.com)  
Jane Kim (#298192)  
(jkim@kbkllp.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: 415 496 6723  
Fax: 650 636 9251

## *Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

**PG&E CORPORATION.**

- and -

# PACIFIC GAS AND ELECTRIC COMPANY,

## Debtors.

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

*\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

**(Lead Case) (Jointly Administered)**

**DECLARATION OF ROBB MCWILLIAMS  
IN SUPPORT OF REORGANIZED  
DEBTORS' EIGHTY-SIXTH OMNIBUS  
OBJECTION TO CLAIMS (UNTIMELY  
CLAIMS)**

**Response Deadline:  
June 16, 2021, 4:00 p.m. (PT)**

#### **Hearing Information If Timely Response Made:**

Date: June 30, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 I, Robb C. McWilliams, pursuant to section 1746 of title 28 of the United States Code, hereby  
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,  
3 information, and belief:

4 1. I am a Managing Director at the firm of AlixPartners, LLP (“**AlixPartners**”), which is  
5 an affiliate of both AlixPartners, LLC and AP Services, LLC, (“**APS**”). APS was previously retained to  
6 provide interim management services to PG&E Corporation and Pacific Gas and Electric Company, as  
7 debtors and reorganized debtors (collectively, the “**Debtors**,” and as reorganized pursuant to the Plan,  
8 the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”). I  
9 submit this Declaration in support of the *Reorganized Debtors’ Eighty-Sixth Omnibus Objection to  
Claims (Untimely Claims)* (the “**Omnibus Objection**”),<sup>1</sup> filed contemporaneously herewith.

10 2. In my current position, I am responsible for overseeing the Bankruptcy Case Management  
11 component of AlixPartners’ assignment to assist the Reorganized Debtors with various matters related  
12 to these Chapter 11 Cases. My area of responsibility includes the effort by AlixPartners, in coordination  
13 with the Reorganized Debtors, to review and assess the validity of all claims asserted against the Debtors,  
14 other than (a) Fire Claims and Subrogation Wildfire Claims and (b) providing limited support with  
15 respect to Securities Claims. I am generally familiar with the Reorganized Debtors’ day-to-day  
16 operations, financing arrangements, business affairs, and books and records. Except as otherwise  
17 indicated herein, all facts set forth in this Declaration are based upon my personal knowledge, the  
18 knowledge of other AlixPartners professionals working under and alongside me on this matter, my  
19 discussions with the Reorganized Debtors’ personnel, the Reorganized Debtors’ various other advisors  
20 and counsel, and my review of relevant documents and information prepared by the Reorganized  
21 Debtors. If called upon to testify, I would testify competently to the facts set forth in this Declaration. I  
22 am authorized to submit this declaration on behalf of the Reorganized Debtors.  
23

24 3. The AlixPartners team under my supervision has been actively and intimately involved  
25 in the claims review and reconciliation process since shortly after the filing of these Chapter 11 Cases.  
26 AlixPartners initially assisted the Debtors in the preparation of their bankruptcy schedules based on the  
27

---

28 <sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in  
the Omnibus Objection.

1 Debtors' books and records. As claims were filed, AlixPartners coordinated with the Debtors the process  
2 of reconciling filed claims with the Debtors' schedules and books and records to determine the validity  
3 of filed claims based on those schedules and books and records. AlixPartners has developed and  
4 maintains a claims reconciliation database and various data management applications that are used by  
5 the Reorganized Debtors and AlixPartners to identify both valid claims as well as claims that are not  
6 valid in whole or in part and the appropriate grounds for objection to such claims. AlixPartners is now  
7 supporting, and will continue to support, the efforts of the Reorganized Debtors and their counsel to  
8 resolve disputed claims, including by formal objections as necessary.

9       4. As part of the claims review and reconciliation process described above, the AlixPartners  
10 team, working with the Reorganized Debtors' personnel and other professionals, has identified a number  
11 of Proofs of Claim that were filed after the Bar Date elapsed; in fact, more than half of the Claims at  
12 issue here were filed after the Effective Date had passed.

13       5. The Omnibus Objection is directed to the Proofs of Claim specifically identified in  
14 Exhibit 1 to the Omnibus Objection, in the column headed "Claims To Be Disallowed and Expunged,"  
15 and referred to in the Omnibus Objections as the "**Untimely Claims.**" Exhibit 1 to each Omnibus  
16 Objection was prepared by the AlixPartners team under my overall supervision, and I am familiar with  
17 both documents, their contents, and the process under which they were prepared.

18       6. As indicated by the dates identified in the column headed "Date Filed" on Exhibit 1, each  
19 of the Untimely Claims was filed after the passage of the Bar Date, and, in many cases, after the passage  
20 of the Effective Date as well.

21       7. None of the Claimants has sought or obtained relief from the Court pursuant to Rule 9006  
22 of the Bankruptcy Rules to file a late Proof of Claim. Accordingly, the Untimely Claims should be  
23 disallowed and expunged.

24            //

25            //

26            //

27            //

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and  
2 correct to the best of my knowledge, information, and belief. Executed this twentieth day of May, 2021.  
3

4 /s/ Robb McWilliams  
5 Robb McWilliams  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28